

1 **J. BENNETT FRIEDMAN, ESQ., State Bar No. 147056**  
2 *jfriedman@flg-law.com*  
3 **MICHAEL SOBKOWIAK, ESQ., State Bar No. 242718**  
4 *msobkowiak@flg-law.com*

5 **FRIEDMAN LAW GROUP, P.C.**  
6 1900 Avenue of the Stars, 11<sup>th</sup> Fl.  
7 Los Angeles, California 90067  
8 Telephone: (310) 552-8210  
9 Facsimile: (310) 733-5442

10 Attorneys for Plaintiff CKR Global Advisors, Inc.

11  
12 **UNITED STATES BANKRUPTCY COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
14 **LOS ANGELES DIVISION**

15 In re	)	Lead Case No. 2:17-bk-12392-BR
16 <b>MARK ELIAS CRONE,</b>	)	Chapter 7
17	)	Adv. Case No. 2:17-ap-01309-BR
18 Debtor.	)	
19	)	<b>STIPULATION UNDER FED. R. CIV. P.</b>
20 <b>CKR GLOBAL ADVISORS, INC.,</b>	)	<b>41(A) AND FED. R. BANKR. P. 7041 TO</b>
21	)	<b>DISMISS ADVERSARY PROCEEDING</b>
22 Plaintiff,	)	<b>WITH PREJUDICE</b>
23	)	[No Hearing Required]
24 vs.	)	
25 <b>MARK ELIAS CRONE,</b>	)	
26	)	
27 Defendant.	)	
28	)	

1           **TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY**  
2 **JUDGE, AND ALL PARTIES-IN-INTEREST HEREIN:**

3           This *Stipulation Under Fed. R. Civ. P. 41(a) and Fed. R. Bankr. P. 7041 to Dismiss with*  
4 *Prejudice Adversary Proceeding Arising Under 11 U.S.C. § 523* (“Stipulation”) is entered into  
5 between plaintiff CKR Global Advisors, Inc. (“Global Advisors”), and defendant Mark Crone  
6 (“Crone,” and collectively with Global Advisors, the “Parties”), by and through their respective  
7 attorneys’ of record. This Stipulation is made with reference to the following facts:

8           A.     On February 18, 2017, Crone filed a voluntary petition under chapter 7 of the  
9 Bankruptcy Code.<sup>1</sup>

10          B.     On June 12, 2017, Global Advisors initiated the above adversary proceeding  
11 (“Adversary Proceeding”) by filing its *Complaint to Determine Dischargeability of Debts*.

12          C.     On December 27, 2017, Global Advisors filed its *First Amended Complaint for*  
13 *Determination of Dischargeability of Debt Pursuant to Section 523 of the Bankruptcy Code* (“First  
14 Amended Complaint”).

15          D.     No claims under Bankruptcy Code section 727 have been asserted in the Adversary  
16 Proceeding.

17          E.     On January 10, 2018, Crone filed *Defendant’s Answer to Amended Complaint and*  
18 *Affirmative Defenses*, denying Global Advisors’ claims asserted in the Amended Complaint.

19          F.     On December 13, 2018, the Parties entered into a Settlement Agreement, which  
20 provides for dismissal with prejudice of the Adversary Proceeding, with the Parties to bear their  
21 respective attorneys’ fees and costs.

22           **WHEREFORE**, subject to court approval, the Parties stipulate as follows:

23          1.     The Adversary Proceeding is dismissed with prejudice, with the parties to each bear  
24 his or its own attorneys’ fees and costs.


25          2.     The undersigned represent and warrant that they have the authority to enter into this  
26 Stipulation on behalf of their respective clients.

27  
28           \_\_\_\_\_  
<sup>1</sup> 11 U.S.C. §§ 101, *et seq.*

1           3.       This Stipulation may be signed in counterparts, which, when taken as a whole, shall  
2 constitute one and the same document.


3  
4 Dated: January 17, 2019

FRIEDMAN LAW GROUP, P.C.

5  
6 By:   
Michael Sobkowiak, Esq.  
Attorneys for CKR Global Advisors, Inc.

7  
8 Dated: January 17, 2019

LESLIE COHEN LAW PC

9  
10 By:   
Leslie Cohen, Esq.  
Attorneys for Mark Crone

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

1900 Avenue of the Stars, 11<sup>th</sup> Floor, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled **STIPULATION UNDER FED. R. CIV. P. 41(A) AND FED. R. BANKR. P. 7041 TO DISMISS ADVERSARY PROCEEDING WITH PREJUDICE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 1/17/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Stephen F Biegenzahn** efile@sfbllaw.com
- **Leslie A Cohen** leslie@lesliecohenlaw.com; jaime@lesliecohenlaw.com; odalys@lesliecohenlaw.com
- **Howard M Ehrenberg (TR)** ehrenbergtrustee@sulmeyerlaw.com, ca25@ecfbis.com; C123@ecfbis.com; hehrenberg@ecf.inforuptcy.com
- **J. Bennett Friedman** jfriedman@flg-law.com; msobkowiak@flg-law.com; jmartinez@flg-law.com
- **Michael D Sobkowiak** msobkowiak@flg-law.com; jmartinez@flg-law.com; jfriedman@flg-law.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)* 1/17/2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Hon. Barry Russell  
United States Bankruptcy Court  
255 E. Temple Street, Suite 1660  
Los Angeles, CA 90012

David M. Goodrich, Esq.  
Steven F. Werth, Esq.  
Sulmeyer Kupetz  
333 South Hope Street, 35th Floor  
Los Angeles, CA 90071

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

1/17/2019  
Date

Jackeline Martinez  
Printed Name

/s/Jackeline Martinez  
Signature